



U.S. Department of Energy
Office of River Protection

P.O. Box 450
Richland, Washington 99352

02-OSR-0629

Mr. R. F. Naventi, Project Manager
Bechtel National, Inc.
2435 Stevens Center
Richland, Washington 99352

Dear Mr. Naventi:

**CONTRACT NO. DE-AC27-01RV14136 – APPROVAL OF REQUEST TO COMMENCE
ADDITIONAL LIMITED PROCUREMENT**

- References:
1. BNI letter from R. F. Naventi to R. J. Schepens, ORP, "Additional Request for U.S. Department of Energy Approval to Commence Limited Procurement," CCN: 040377, dated October 16, 2002.
 2. BNI letter from R. F. Naventi to R. J. Schepens, ORP, "Procurement Documents Consistency with Preliminary Safety Analysis Report Commitments and Potential Impact of Unverified Assumptions on Procurement Documents," CCN: 045044, dated December 23, 2002.
 3. ORP letter from R. J. Schepens to R. F. Naventi, BNI, "Disapproval of Bechtel National, Inc. (BNI) Request to Commence Additional Limited Procurement," 02-OSR-0548, dated November 21, 2002.

This letter approves the Reference 1 Bechtel National, Inc. (BNI) request for authorization of additional limited procurement as modified by Reference 2.

In Reference 1, BNI requested approval to commence procurement of materials and components for use in construction of the Pretreatment, High-Level Waste (HLW) vitrification, Low-Activity Waste (LAW) vitrification, and Analytical Laboratory facilities. These items include jumpers, steam ejectors, jet pump pairs, autosampling systems, condenser components, and various vessels. Reference 1 also requested authorization to procure additional material for the analytical laboratory, pretreatment facility, and balance of facilities for types of material similar to those authorized in the LAW and HLW full facility construction authorization. When unique or similar material has not been previously authorized prior to construction authorization for the specific facility, limited procurement authorization will be requested per the requirements of 10 CFR 830.206, "Preliminary Documented Safety Analysis." BNI committed to review these procurements to ensure consistency with the evolving authorization basis.

Reference 3 disapproved the Reference 1 request due to discrepancies regarding quality levels (QL) specified for cesium ion-exchange feed coolers. Specifically, they were specified as QL-2 when the Preliminary Safety Analysis Report (PSAR) commits that these components will be

procured to QL-1 requirements. Additionally, the U.S. Department of Energy (DOE), Office of River Protection (ORP) requested information regarding BNI's strategy for addressing unverified assumptions in limited procurements.

Reference 2 corrected the discrepancies in the QL of materials and components by stating that the cesium ion-exchange feed coolers will be QL-1. Also, Reference 2 described BNI's strategy for addressing unverified assumptions in limited procurements. BNI committed that unverified assumptions associated with the procurements will be resolved, to the extent necessary to support fabrication, prior to commencement of fabrication by the supplier. If this process leads to changes in the PSAR, these will be processed according to project procedures for authorization basis management. Reference 2 also revised the list of requested limited procurement material and components, removing LAW and HLW items because full facility construction has been authorized for these facilities.

Based on review of References 1 and 2, the ORP determined the following:

- The proposed procurements will not give rise to a significant adverse impact on the environment, mission, or safety.
- The proposed procurements do not foreclose subsequent adoption of likely alternatives or options.
- Delay in conducting the procurements could adversely affect the DOE mission to retrieve and treat Hanford's tank waste and close the tank farms to protect the Columbia River.

The ORP determined the procurement of the materials and components proposed by BNI is not detrimental to public health and safety and is in the best interest of DOE. Therefore, the limited procurements proposed by BNI in Reference 1 as modified by Reference 2 are approved according to the requirements of 10 CFR 830.206. This approval does not signify that ORP concurs with the safety classifications indicated by the QL assigned to the Procurements. BNI must ensure that procurements of important-to-safety structures, systems, and components conform to requirements of the evolving authorization basis.

If you have any questions, please contact me, or your staff may call Lewis F. Miller, Jr., WTP Safety Regulation Division, (509) 376-6817.

Sincerely,

Roy J. Schepens
Manager

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